

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

This Document Relates to:
ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION FOR
ENFORCEMENT OF THE PROTECTIVE
ORDER**

Judge: Hon. Charles R. Breyer
Courtroom: 6 - 17th Floor (zoom)

DECLARATION OF SARAH R. LONDON
CASE NO. 3:23-MD-03084-CRB (LJC)

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. At Uber's request, I met and conferred with Uber counsel Chris Cotton on August
8 25, 2025.

9 3. During that call, Uber asserted that Plaintiffs' responses to Judge Cisneros's August
10 1, 2025 and August 11, 2025 orders (ECF 3625 & 3676) were deficient.

11 4. During the call, I re-confirmed for Uber that Plaintiffs' Co-Lead Counsel reviewed
12 the details of the August 1 order with all Plaintiffs' counsel, and that, as far as Co-Lead Counsel
13 knew, no firm had litigation funding to disclose.

14 5. I asked Uber's counsel to provide any information they had suggesting any firm
15 had not complied with Court orders.

16 6. I committed that Co-Lead Counsel would investigate any specific or credible
17 allegations against any Plaintiff's counsel and take swift and thorough action.

18 7. In response, Uber offered only generalities and innuendo.

19 8. Attached as **Exhibit A** is a true and correct copy of Defendants' First Set of
20 Requests for Admissions to Plaintiff Jaylynn Dean, served on August 26, 2025.

21 9. Attached as **Exhibit B** is a true and correct copy of Defendants' Third Set of
22 Requests for Production to Plaintiff Jaylynn Dean, served on August 26, 2025.

23 10. Attached as **Exhibit C** is a true and correct copy of Defendants' Third Set of
24 Interrogatories to Plaintiff Jaylynn Dean, served on August 26, 2025.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed this 8th day of October, 2025 in San Francisco, California.

27 /s/ Sarah R. London

28 Sarah R. London